

CCC:MEM

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

17  
X

944M

UNITED STATES OF AMERICA  
- against -

COMPLAINT

(21 U.S.C. § 846)

CARMINE CORRIERI,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

RAUL MERCADO, being duly sworn, deposes and states that he is a Task Force Officer of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, in or about and between January 2016 and October 2017, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant CARMINE CORRIERI, together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1). The amount of cocaine base involved in the conspiracy attributable to the defendant, as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, was 280 grams or more of a substance containing cocaine base.

(Title 21, United States Code, Sections 846 and 841(b)(1)(A)(iii); Title 18, United States Code, Sections 3551 et seq.).

The source of your deponent's information and belief are as follows:<sup>1</sup>

1. I am a Task Force Officer with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”) and have been involved in the investigation of numerous cases involving narcotics, including cocaine base. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file; and from reports of other law enforcement officers involved in the investigation.

2. In or about and between September 2017 and October 2017, a confidential informant (“CI #1”) observed the defendant CARMINE CORRIERI, on dozens of occasions, sell cocaine base in Suffolk County, New York. Specifically, CI #1 pooled his/her money with other individuals and traveled to CORRIERI’s home in Coram, New York. Upon arriving at CORRIERI’s home, CI #1 observed individuals that he/she had pooled money with, purchase cocaine base from CORRIERI. During this time period, CI #1 personally observed CORRIERI sell in excess of 90 grams of cocaine base.<sup>2</sup>

3. In or about and between June 2016 and July 2016, a confidential informant (“CI #2”), on two occasions, purchased a total of approximately 3 grams of cocaine base from the defendant CARMINE CORRIERI in Suffolk County, New York. Further, CI #2 provided law enforcement with a telephone number that he/she had previously used to contact

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<sup>1</sup> Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

<sup>2</sup> CI #1 identified the person from whom he/she purchased cocaine base as “Carmine” and identified a photograph of the defendant CARMINE CORRIERI to law enforcement officers. CI #1 has proven reliable as information provided by him/her has been corroborated by other sources of evidence, including other informants, police database searches, police paperwork, social media accounts, and the observations of law enforcement.

CORRIERI, most recently in August 2017 (the "CORRIERI PHONE"). Additionally, CI #2 told law enforcement officers that he witnessed CORRIERI sell cocaine base to other individuals on dozens of occasions between June 2017 and August 2017.<sup>3</sup>

4. In or about August 2017, a confidential informant ("CI #3")<sup>4</sup> informed law enforcement officers that the defendant CARMINE CORRIERI has been selling, among other drugs, cocaine base. CI #3 also told law enforcement officers CORRIERI'S PHONE that CORRIERI was using the CORRIERI PHONE to sell drugs.

5. According to CI #1 and CI #2, the defendant CARMINE CORRIERI sold in excess of 280 grams of cocaine base in Suffolk County, New York, between June 2016 and October 2017.

6. On October 31, 2017, law enforcement officers arrested the defendant CARMINE CORRIERI outside of his home in Coram, New York. CORRIERI was read his Miranda rights, which he waived and agreed to be interviewed. During questioning, CORRIERI admitted, in sum and substance, that he has been dealing cocaine base since he was 18 years old. CORRIERI further stated that he currently sells approximately 70 grams of cocaine base per week. CORRIERI explained that he gets the cocaine base that he sells from a drug dealer in Bellport, New York. CORRIERI stated that on one occasion, in the summer of 2017,

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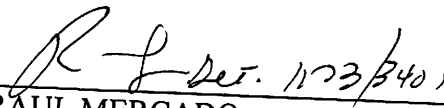
<sup>3</sup> CI #2 identified the defendant CARMINE CORRIERI by the defendant's complete name. In addition, CI #2 identified a photograph of CORRIERI to law enforcement officers. CI #2 has proven to be reliable as information provided by him/her has been corroborated by other sources of information, including other informants, police database searches, police paperwork, social media accounts, and police observations.

<sup>4</sup> CI #3 identified the defendant CARMINE CORRIERI by the defendant's complete name. In addition, CI #3 identified a photograph of CORRIERI to law enforcement officers. CI #3 has proven to be reliable as information provided by him/her has been corroborated by other sources of information, including other informants, police database searches, police paperwork, social media accounts, and police observations.


CORRIERI purchased 50 grams of cocaine base, and was given an additional 50 grams of cocaine base on consignment, both for redistribution.

WHEREFORE, your deponent respectfully requests that the defendant CARMINE CORRIERI be dealt with according to law.

Dated: Central Islip, New York  
November 1, 2017

  
RAUL MERCADO  
Task Force Officer  
Department of Homeland Security  
Homeland Security Investigations

Sworn to before me on  
the 1 day of November, 2017

  
THE HONORABLE ARLENE R. LINDSAY  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK